

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:19-cr-59
)	
DANIEL E. HALE,)	Hon. Liam O’Grady
)	
Defendant.)	

**DEFENSE NOTICE OF WAIVER OF RIGHTS TO
SPEEDY TRIAL AND TO BE PRESENT AT MOTION HEARING**

Comes now defendant, Daniel Everette Hale, through counsel, who states:

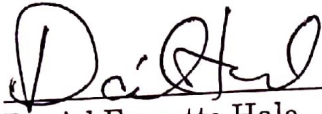
1. Trial in this matter is now scheduled for December 1, 2020. The defense, however, has filed a motion to continue the trial for a number of reasons including the recent production of discovery, Mr. Hale’s physical condition as he recuperates from a serious accident, and the resurgence of the global novel coronavirus pandemic. The Court has scheduled a hearing on the Motion to Continue on November 10, 2020.

2. Defense counsel have discussed with Mr. Hale his right to a speedy trial under the Speedy Trial Act, 18 U.S.C. § 3161, as well as his right to be present at the November 10, 2020, motion hearing, *see* Fed. R. Crim. P. 43. Mr. Hale waives his right to a speedy trial, consents to a continuance of the currently scheduled trial date, and also waives his right to be present at the November 10 motion hearing.

3. Through his signature below, Mr. Hale confirms that he waives his right to be present at the November 10, 2020 hearing, that he consents to a continuance of

the trial now scheduled for December 1, 2020, and waives his rights under 18 U.S.C. § 3161 for this purpose.

Acknowledgement:



Daniel Everette Hale

Dated: November 10, 2020

Respectfully submitted,

DANIEL E. HALE
By Counsel

/s/

Todd M. Richman
Va. Bar No. 41834
Cadence Mertz
Va. Bar No. 89750
Counsel for Mr. Hale
Assistant Federal Public Defenders
1650 King Street, Suite 500
Alexandria, Virginia 22314
(703) 600-0845 (T)
(703) 600-0880 (F)
Todd_Richman@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2020, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record.

/s/

Todd M. Richman
Assistant Federal Public Defender
Counsel for Mr. Hale
1650 King Street, Suite 500
Alexandria, Virginia 22314
(703) 600-0845 (T)
(703) 600-0880 (F)
Todd_Richman@fd.org